Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-22 are pending in the application, with claims 1, 9, 12 and 20 being the independent claims. Claims 1, 4, 9, 12, 15 and 20 are sought to be amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

The Examiner has rejected claims 1, 3, 5, 9, 12, 14, 16 and 20 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,169,539 to Lee *et al.* ("Lee"). Based on the following remarks, Applicants respectfully traverse.

Independent claim 1 is directed to a display capable of displaying images in response to signals of a plurality of signal formats. Claim 1, as amended, includes:

> a controller that is coupled to a plurality of image data interfaces;
>
> wherein said controller identifies the image data signal format associated with each of the plurality of image data interfaces and selects one of the plurality of image data interfaces according to preference variables associated with each of the plurality of image data interfaces when the plurality of image data interfaces are operating simultaneously.

Independent claim 12 is directed to a display adapter capable of receiving signals of a plurality of signal formats and converting the signals for display on a coupled display device. Claim 12, as amended, includes:

a controller that is coupled to a plurality of image data interfaces;

wherein said controller identifies the image data signal format associated with each of the plurality of image data interfaces and selects one of the plurality of image data interfaces according to preference variables associated with each of the plurality of image data interfaces when the plurality of image data interfaces are operating simultaneously.

Lee does not teach each of the foregoing features of claims 1 and 12. For example, Lee does not teach a controller that is coupled to a plurality of image data interfaces, wherein said controller identifies the image data signal format associated with each of the plurality of image data interfaces, as recited in claims 1 and 12.

Lee describes an analog video signal selection circuit for automatically or manually selecting a data signal and synchronous signals from two different channels. The analog video signal selection circuit selects one of R1, G1, and B1 data from a first channel or R2, G2, and B2 data from a second channel, and selects one of HS1 and VS1 synchronous signals from a first channel or HS2 and VS2 synchronous signals from a second channel. (Lee at Abstract and FIG. 1).

The "image data signal format," as recited in claims 1 and 12, generally refers to an electrical signaling format such as, among other transmission formats, transition minimized differential signaling (TMDS) for digital signals and red, green, blue (RGB) for analog signals. (Specification of the instant application at paragraph [0040]). The synchronous signals together with the image data are generally considered to form a composite video signal. Thus, the analog video signal selection circuit of Lee merely selects one of two video signals having the same image data signal format (i.e., RGB format).

Lee does not address the problem of a display/display adapter being simultaneously presented with image data signals of different formats because the analog video signal selection circuit of Lee is apparently designed to support only one image data signal format (i.e., RGB format). (Lee at FIG. 1). Accordingly, Lee fails to describe a controller that is coupled to a plurality of image data interfaces, wherein said controller identifies the image data signal format associated with each of the plurality of image data interfaces, as recited in claims 1 and 12.

Similarly, independent claim 9 is directed to a method of establishing operation between a processor and a display, the display capable of displaying images in response to signals of a plurality of signal formats generated by the processor. Claim 9, as amended, includes the steps of:

> detecting a plurality of image data interfaces operating simultaneously;
> identifying the image data signal format of each of the plurality of image data interfaces; and
> selecting one of the plurality of image data interfaces.

Likewise, independent claim 20 is directed to a method of establishing operation between a processor and a display adapter, the display adapter capable of receiving signals of a plurality of signal formats and converting the signals for display on a coupled display device. Claim 20, as amended, includes the steps of:

> detecting a plurality of image data interfaces operating simultaneously;
> identifying the image data signal format of each of the plurality of image data interfaces; and
> selecting one of the plurality of image data interfaces.

For the same reasons described above with respect to claims 1 and 12, Lee fails to teach each of the foregoing features of claims 9 and 20. At a minimum, Lee fails to teach detecting a plurality of image data interfaces operating simultaneously and identifying the format of each of the plurality of image data interfaces, as recited in claims 9 and 20.

Because Lee fails to teach all of the limitations of claims 1, 9, 12 and 20, Lee fails to anticipate claims 1, 9, 12 and 20 under 35 U.S.C. §102(e). Furthermore, Lee fails to anticipate claims 3, 5, 14 and 16 for at least the same reasons as independent claims 1 and 12, from which they depend, and further in view of their own features. Accordingly, the Examiner's rejection of claims 1, 3, 5, 9, 12, 14, 16 and 20 under 35 U.S.C. §102(e) is traversed and Applicants respectfully request that the rejection be reconsidered and withdrawn.

The Examiner has rejected claims 9, 11, 20 and 22 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,329,981 to Lin et al. ("Lin"). Based on the following remarks, Applicants respectfully traverse.

As described above, independent claim 9 is directed to a method of establishing operation between a processor and a display, the display capable of displaying images in response to signals of a plurality of signal formats generated by the processor. Claim 9, as amended, includes the steps of:

> detecting a plurality of image data interfaces operating simultaneously;
> identifying the image data signal format of each of the plurality of image data interfaces; and
> selecting one of the plurality of image data interfaces.

- 12 -

MENDELSON *et al.*
Appl. No. 10/626,576
Atty. Docket: 877.51

Similarly, independent claim 20 is directed to a method of establishing operation between a processor and a display adapter, the display adapter capable of receiving signals of a plurality of signal formats and converting the signals for display on a coupled display device. Claim 20, as amended, includes the steps of:

> detecting a plurality of image data interfaces operating simultaneously;
> identifying the image data signal format of each of the plurality of image data interfaces; and
> selecting one of the plurality of image data interfaces.

Lin does not teach each of the foregoing features of claims 9 and 20. For example, Lin does not teach detecting a plurality of image data interfaces operating simultaneously and identifying the image data signal format of each of the plurality of image data interfaces, as recited in claims 9 and 20.

Lin describes an apparatus and method for detecting the video mode of a video signal from a graphics card. (Lin at col. 1, lines 15-18). Lin further describes a video mode detection circuit that receives a plurality of synchronous signals and a video data signal from a graphics card, and generates a video mode based on the total number of lines per frame of the video data, the number of active lines per frame of video data, and the horizontal and vertical timing parameters. (Lin at col. 6, lines 52-67 to col. 7, line 3 and FIG. 2).

Nowhere does Lin describe detecting a plurality of image data interfaces operating simultaneously, as recited in claims 9 and 20. Rather, FIG. 2 of Lin shows a video mode detection circuit 320*a* receiving from a graphics card 315 a single composite video signal that includes an analog video data signal 317 and horizontal and vertical synchronous signals. An "image data interface," as recited in claims 9 and 20, has an

associated image data signal format such as, among other transmission formats, TMDS

for digital image data signals and RGB for analog image data signals, as described

above. (Specification of the instant application at Abstract and paragraph [0040]).

Accordingly, the video mode detection circuit of Lin apparently receives only one image

data interface, which is described and shown as having an associated analog image data

signal format. (Lin at FIGS. 3, 4A and 4B). Thus, Lin fails to teach detecting a plurality

of image data interfaces operating simultaneously and identifying the image data signal

format of each of the plurality of image data interfaces, as recited in claims 9 and 20.

Because Lin fails to teach all of the limitations of claims 9 and 20, Lin fails to

anticipate claims 9 and 20 under 35 U.S.C. §102(e). Furthermore, Lin fails to anticipate

claims 11 and 22 for at least the same reasons as independent claims 9 and 20, from

which they depend, and further in view of their own features. Accordingly, the

Examiner's rejection of claims 9, 11, 20 and 22 under 35 U.S.C. §102(e) is traversed and

Applicants respectfully request that the rejection be reconsidered and withdrawn.

Rejections under 35 U.S.C. § 103

The Examiner has rejected claims 2, 4, 13 and 15 under 35 U.S.C. §103(a) as

being unpatentable over Lee in view of U.S. Patent No. 6,333,750 to Odryna *et al.*

("Odryna"). Based on the following remarks, Applicants respectfully traverse.

As described above, Lee does not teach or suggest all of the features of

independent claims 1 and 12, as amended. Furthermore, Odryna does not supply the

missing teachings. At a minimum, any combination of Lee and Odryna fails to teach or

suggest a controller that is coupled to a plurality of image data interfaces, wherein said

controller identifies the image data signal format associated with each of the plurality of

image data interfaces, as recited in claims 1 and 12.

Since neither Lee nor Odryna, alone or in combination, teaches or suggests all of

the limitations of claims 1 and 12, the combination of Lee and Odryna fails to support a

prima facie case of obviousness rejection of claims 2, 4, 13 and 15 for at least the same

reasons as independent claims 1 and 12 from which they depend, and further in view of

their own features. Accordingly, the Examiner's rejection of claims 2, 4, 13 and 15 under

35 U.S.C. § 103(a) is traversed and Applicants respectfully request that the rejection be

reconsidered and withdrawn.

The Examiner has rejected claims 6 and 17 under 35 U.S.C. §103(a) as being

unpatentable over Lee in view of U.S. Patent No. 5,917,552 to Van Court ("Van Court").

Based on the following remarks, Applicants respectfully traverse.

As described above, Lee does not teach or suggest all of the features of

independent claims 1 and 12, as amended. Furthermore, Van Court does not supply the

missing teachings. At a minimum, any combination of Lee and Van Court fails to teach

or suggest a controller that is coupled to a plurality of image data interfaces, wherein said

controller identifies the image data signal format associated with each of the plurality of

image data interfaces, as recited in claims 1 and 12.

Since neither Lee nor Van Court, alone or in combination, teaches or suggests all

of the limitations of claims 1 and 12, the combination of Lee and Van Court fails to

support a prima facie case of obviousness rejection of claims 6 and 17 for at least the

same reasons as independent claims 1 and 12 from which they depend, and further in

view of their own features. Accordingly, the Examiner's rejection of claims 6 and 17

under 35 U.S.C. § 103(a) is traversed and Applicants respectfully request that the rejection be reconsidered and withdrawn.

The Examiner has rejected claims 7, 8, 18 and 19 under 35 U.S.C. §103(a) as being unpatentable over Lee in view of Van Court as applied to claims 6 or 17 above, and further in view of U.S. Patent No. 6,028,646 to Jeong *et al.* ("Jeong"). Based on the following remarks, Applicants respectfully traverse.

As described above, Lee does not teach or suggest all of the features of independent claims 1 and 12, as amended. Furthermore, Van Court and Jeong do not supply the missing teachings. At a minimum, any combination of Lee, Van Court and Jeong fails to teach or suggest a controller that is coupled to a plurality of image data interfaces, wherein said controller identifies the image data signal format associated with each of the plurality of image data interfaces, as recited in claims 1 and 12.

Since neither Lee, Van Court, nor Jeong, alone or in combination, teaches or suggests all of the limitations of claims 1 and 12, the combination of Lee, Van Court and Jeong fails to support a prima facie case of obviousness rejection of claims 7, 8, 18 and 19 for at least the same reasons as independent claims 1 and 12 from which they depend, and further in view of their own features. Accordingly, the Examiner's rejection of claims 7, 8, 18 and 19 under 35 U.S.C. § 103(a) is traversed and Applicants respectfully request that the rejection be reconsidered and withdrawn.

The Examiner has rejected claims 10 and 21 under 35 U.S.C. §103(a) as being unpatentable over Lin. Based on the following remarks, Applicants respectfully traverse.

As described above, Lin does not teach or suggest all of the features of independent claims 9 and 20, as amended. At a minimum, Lin fails to teach or suggest

- 16 -

MENDELSON *et al.*
Appl. No. 10/626,576
Atty. Docket: 877.51

detecting a plurality of image data interfaces operating simultaneously and identifying the image data signal format of each of the plurality of image data interfaces, as recited in claims 9 and 20.

Since Lin fails to teach or suggest all of the limitations of claims 9 and 20, Lin fails to support a prima facie case of obviousness rejection of claims 10 and 21 for at least the same reasons as independent claims 9 and 20 from which they depend, and further in view of their own features. Accordingly, the Examiner's rejection of claims 10 and 21 under 35 U.S.C. § 103(a) is traversed and Applicants respectfully request that the rejection be reconsidered and withdrawn.

Other Matters

The Examiner did not consider References AO1 and AQ1 identified on the Form PTO-1449 filed July 1, 2004, because the documents were apparently not found in the parent application file. Accordingly, Applicants have submitted herewith copies of the documents and respectfully request that the Examiner indicate in the official file wrapper of the instant application that the documents have been considered.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for

allowance. If the Examiner believes, for any reason, that personal communication will

expedite prosecution of this application, the Examiner is invited to telephone the

undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully

requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

Nicole D. Dretar
Attorney for Applicants
Registration No. 54,076

Date: 02-28-2005

1100 New York Avenue, N.W.
Washington, D.C. 20005-3934
(202) 371-2600

343742_2.DOC